

EXHIBIT A

Christie Hebert

From: Christie Hebert
Sent: Friday, February 16, 2024 2:03 PM
To: Charles Frigerio
Cc: Daniel Nelson; Joshua Windham; Piatt, Robert; Bowen, Susan
Subject: RE: Schott v. Babb et al.: Copies of Draft Protective Order and Correspondence from Plaintiff's Counsel

Charles,

Thank you for the quick phone conversation today.

I just spoke with my client. Alek does not oppose mediating this case before a magistrate judge in the Western District, San Antonio Division provided the mediation is scheduled for a half-day Zoom session. But, as I indicated on the phone and outlined in the offer letter sent 10/11/23, a settlement comprised purely of monetary compensation is a nonstarter. If Defendants are only willing to provide Alek monetary compensation, mediation will not be productive.

Best,
Christie

From: Charles Frigerio <csf@frigeriolawfirm.com>
Sent: Friday, February 16, 2024 12:30 PM
To: Christie Hebert <chebert@ij.org>
Cc: Daniel Nelson <dnelson@ij.org>; Joshua Windham <jwindham@ij.org>; Piatt, Robert <robert.piatt@bexar.org>; Bowen, Susan <sbowen@bexar.org>
Subject: RE: Schott v. Babb et al.: Copies of Draft Protective Order and Correspondence from Plaintiff's Counsel

Counsel,

I have reviewed Plaintiff's Demand Letter and Defendants' Rejection.
We know that the Mediation deadline is July 2, 2024.

With that deadline in mind, I plan to file an Advisory with the Court requesting a Magistrate Mediate our case. We can at least have a date for mediation within the scheduling order deadline.
Please advise if you are opposed to a Magistrate in the Western District, San Antonio Division mediating the case.

Regards,



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